

Appln No. 09/692,829

Amdt date August 27, 2003

Reply to Office action of February 27, 2003

**REMARKS/ARGUMENTS**

Claims 1-73 and 75-98 are currently pending in this application. Applicants have cancelled claim 74 and amended claims 1-4, 6-8, 12, 19-21, 23-33, 35-44, 46-47, 49-56, 58-59, 61-71, 73, 75, 78-98. In view of the above amendments and following remarks, applicants respectfully submit that the application is in condition for allowance. Applicants therefore, respectfully request reconsideration and allowance of the application.

The claims as originally presented included duplicate claims 76, 77 and 84. Applicants have therefore renumbered the originally presented claims 76-95 as claims 78-98.

The Examiner rejected claims 1, 2, 4-7, 9, 10, 12-23, 25, 27, 30-33, 35-39, 41, 44-46, 48, 49-51, 53, 55, 56, 58-61, 63-65, 67, 69, 70, 73 and 88-93 under 35 U.S.C. 102(e) as allegedly being anticipated by Lewis et al. (U.S. Patent 6,233,565). Applicants respectfully traverse this rejection.

Independent claims 1, 19, 36, 50, 59, 64, 70 and 91 (claim 88 as originally presented) recite "a server system, coupled to the client subsystem, the server system having one or more databases storing user account information ... and a network coupled with the server system to provide support personnel, having a predetermined authorization level, access to the user account information..."

Independent claims 1, 19, 36, 50, 59, 64, 70 and 91 further recite code to allow the support personnel to perform various functions such as, customer support, administration of a VBI meter, payment administration support, accounts receivable

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support, meter refund and withdrawal processing support, misprint processing support and quality assurance (QA) envelope handling capabilities respectively. Applicants respectfully submit that Lewis does not disclose or suggest the recited limitations.

Rather, as illustrated in FIG. 1, Lewis simply discloses a system for conducting Internet based financial transactions having a customer (also referred to as a "client") 2n, a remote service provider (RSP) 4, and a third party seller of goods and/or services (TPS) 6... The client 2n has a Host system 10n and a PSD 20n which is resident on a server of RSP 4. The Host 10n accesses the remote PSD 20n via the Internet 30." (Lewis, col. 6. lines 39-59)

Referring to FIG. 2, the remote service provider of Lewis is further defined to include a "web server 150 that is used by customers for registration and client software download and is the apparent website; (2) A transaction server(s) 150 that serves as the transactional link between the customer's Host PC 10n and all RSP 4 functions; and (3) A series of database servers 170 that perform all of the RSP 4-related and TPS 6-required functions." (Lewis, col. 7. line 35 - col. 8, line 7).

Lewis does not however, disclose or suggest a network coupled with the server system to provide support personnel, having a predetermined authorization level, access to the user account information. Neither does Lewis disclose or suggest code that allows the support personnel to provide the various functions recited in claims 1, 19, 36, 50, 59, 64, 70 and 91 of the present invention.

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Applicants therefore respectfully submit that claims 1, 19, 35, 50, 59, 64, 70 and 91 are novel and unobvious in view of Lewis and are therefore allowable. Applicants further submit that all claims that depend directly or indirectly from claims 1, 19, 36, 50, 59, 64, 70, 75 and 91 are allowable as are claims 1, 19, 36, 50, 59, 64, 70 and 91 and for additional limitations recited therein.

Similarly, independent method claims 93 and 95 (claims 90 and 92 as originally presented) recite "providing a server system having one or more databases storing user account information ... providing a network coupled to the server system to provide support personnel, having a predetermined authorization level, access to the user account information..." Claims 93 and 95 further recite providing code which allows the support personnel to administer a user VBI meter and to provide payment administration support respectively. Applicants respectfully submit that Lewis does not disclose or suggest the recited limitations.

Rather as argued above with respect to claims 1, 19, 36, 50, 59, 64, 70, 75 and 91 Lewis simply discloses a system having a customer 2n, a remote service provider (RSP) 4, and a third party seller of goods and/or services. Lewis does not disclose or suggest a network coupled with the server system to provide support personnel, having a predetermined authorization level, access to the user account information. Neither does Lewis disclose or suggest code that allows the support personnel to administer a user VBI meter and to provide payment administration support as recited in claims 93 and 95.

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Applicants therefore respectfully submit that independent claims 93 and 95 are novel and unobvious in view of Lewis and are allowable. Applicants further submit claim 94 and claim 96 that depend on claim 93 and claim 95 respectively, are allowable as are claims 93 and 95 and for additional limitations recited therein.

The Examiner rejected claims 75-87, 94 and 95 under 35 U.S.C. 103(a) as allegedly being obvious over Lewis in view of Remington et al., (U.S. Patent 6,070,150). Applicants respectfully traverse this rejection.

Independent claim 75 recites "a network coupled to the server system to provide support personnel, having a predetermined authorization level, access to the user account information, and a billing code to allow the support personnel to provide payment processing and billing functions." Applicants respectfully submit that the cited references do not disclose or suggest the recited limitations.

Similarly independent method claim 97 (claim 94 as originally presented) recites "providing a server system having one or more databases storing user account information ... providing a network coupled to the server system to provide support personnel, having a predetermined authorization level, access to the user account information; and providing code which allows the support personnel to provide payment administration support to a user." Applicants further submit that the cited references do not disclose or suggest the recited limitations from claim 97.

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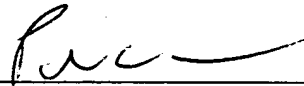
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Rather as argued above with respect to claims 1, 19, 36, 50, 59, 64, 70, 75 and 91 Lewis simply discloses a system having a customer 2n, a remote service provider (RSP) 4, and a third party seller of goods and/or services. Lewis does not disclose or suggest a network coupled with the server system to provide support personnel, having a predetermined authorization level, access to the user account information. Neither do the recited references disclose or suggest code that allows the support personnel to provide payment processing and billing functions or payment administration support to a user as recited in claims 75 and 97 respectively.

Accordingly, applicants respectfully submit that independent claims 75 and 97 are novel and unobvious in view of the cited references and are allowable. Applicants further submit claims 76-90 and claim 98 that depend on claim 75 and claim 97 respectively, are allowable as are claims 75 and 97 and for additional limitations recited therein.

It is therefore respectfully submitted that pending claims 1-73 and 75-98 are in condition for allowance, and an early notice of allowance is respectfully requested.

Respectfully submitted,  
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